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6 Attorneys for Plaintiff,
7 STERLING SAVINGS BANK

8
9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 STERLING SAVINGS BANK, a
13 Washington corporation, Successor In
14 Interest by Merger to SONOMA
NATIONAL BANK,

15 Plaintiff,

16 v.

17 NORMAN POULSEN, aka LISA
18 POULSEN, an individual; and DOES 1
19 through 10, inclusive,

20 Defendants.

Case No. 3:12-cv-01454-EDL

STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DEADLINES

AS MODIFIED

STIPULATION

IT IS HEREBY STIPULATED by and between plaintiff Sterling Savings Bank ("Plaintiff") and defendant Lisa Poulsen, aka Norman Poulsen ("Defendant"), through their respective counsel of record, as follows:

WHEREAS, this Court entered a Case Management and Pretrial Order for Jury Trial for this action on October 3, 2013, which set forth the following dates and deadlines:

1. Jury trial to begin on June 17, 2013;
2. All non-expert discovery to be completed no later than February 1, 2013;
3. Initial expert disclosures to be made no later than March 15, 2013;
4. Rebuttal expert disclosures to be made no later than March 29, 2013;
5. All expert discovery to be completed no later than April 16, 2013;
6. The last day to file a motion, or stipulation and proposed order, to join other parties or to amend the pleadings was January 2, 2013;
7. The last day for hearing dispositive motions is March 19, 2013;
8. Mediation proceedings are to be completed by December 26, 2012 (within 90 days of the order), or as soon thereafter as possible; and
9. A pretrial conference is to be held on May 28, 2013;

WHEREAS, both Plaintiff and Defendant have been diligent in conducting discovery, and agree that additional time is needed to complete written discovery and depositions necessary for the adjudication of this case;

WHEREAS, the parties commenced mediation on December 4, 2012, and are currently engaged in ongoing mediation and settlement discussions, and agree that it is in the best interest of both Plaintiff and Defendant to undergo further settlement negotiations with the mediator;

WHEREAS, the parties agree that extending the deadlines for discovery, dispositive motions and trial by approximately sixty (60) days would benefit the parties' settlement discussions;

1 NOW, THEREFORE, the parties hereby agree and stipulate:

2 1. Plaintiff and Defendant agree and stipulate that the current schedule for this case,
3 as set forth in this Court's Case Management and Pretrial Order for Jury Trial filed October 3,
4 2012, be modified as follows:

- 5 a. Jury trial is to begin on October 7, 2013;
6 b. All non-expert discovery must be completed no later than April 1, 2013;
7 c. Initial expert disclosures must be made no later than May 17, 2013;
8 d. Rebuttal expert disclosures must be made no later than May 31, 2013;
9 e. All expert discovery must be completed no later than June 30, 2013;
10 f. The last day to file a motion, or stipulation and proposed order, to join other
11 parties or to amend the pleadings is March 1, 2013;
12 g. The last day for hearing dispositive motions is July 15, 2013;
13 h. Mediation proceedings are to be completed by March 1, 2013, or as soon thereafter
14 as possible; and
15 i. A pretrial conference is to be held on September 16, 2013;

16 2. The parties respectfully request that the Court modify the time frames set forth in
17 the aforementioned Case Management and Pretrial Order to reflect the dates and deadlines
18 provided in the preceding paragraph;

19 3. Plaintiff and Defendant have reviewed, agree and consent to the entry of the
20 Proposed Order to Extend Deadlines.

21 **IT IS SO STIPULATED:**

22 DATED: January 7, 2013

23 SHUMENER, ODSON & OH LLP

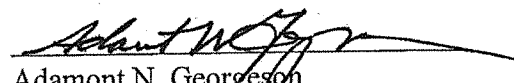
24 By: 

25 John D. Spurling
26 *Attorneys for Plaintiff*
27 STERLING SAVINGS BANK
28

1 DATED: January 7, 2013

2 DOHERTY GEORGESON LLP

3 By:


4 Adamont N. Georgeson
5 *Attorneys for Defendant*
6 LISA POULSEN
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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED:

1. The current schedule for this case, as set forth in the Case Management and Pretrial Order for Jury Trial entered October 3, 2012, shall be modified as follows:

- a. Jury trial is to begin on October 7, 2013;
- b. All non-expert discovery must be completed no later than April 1, 2013;
- c. Initial expert disclosures must be made no later than May 17, 2013;
- d. Rebuttal expert disclosures must be made no later than May 31, 2013;
- e. All expert discovery must be completed no later than June 30, 2013;
- f. The last day to file a motion, or stipulation and proposed order, to join other parties or to amend the pleadings is March 1, 2013;
- g. The last day for hearing dispositive motions is July ¹⁶~~15~~, 2013;
- h. Mediation proceedings are to be completed by March 1, 2013, or as soon thereafter as possible; and
- i. A pretrial conference is to be held on September ¹⁷~~16~~, 2013;

IT IS SO ORDERED.

Dated: January 10, 2013

Elizabeth D. Laporte

Elizabeth D. Laporte
Magistrate Judge of the United States District
Court, Northern District of California

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the City of Los Angeles, in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 550 South Hope Street, Suite 1050, Los Angeles, CA 90071.

On, January 9, 2013 I served the foregoing document(s) described as follows:

STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINES

on the interested parties in this action by delivering a true copy thereof enclosed in a sealed envelope addressed as follows:

Adamont N. Georgeson
Doherty Georgeson LLP
1101 Fifth Avenue, Suite 310
San Rafael, CA 94901
monty@baylaw.us

- ☐ **(BY MAIL)** I deposited such envelope in the mail at Los Angeles California. The envelope was mailed with postage thereon fully prepaid. I am readily familiar with the firm's practice for collection and processing correspondence for mailing. Under that practice, this document will be deposited with the U.S. Postal Service on this date with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
- ☐ **(BY OVERNIGHT DELIVERY/COURIER)** I delivered an envelope or package to a courier or driver authorized by the express service carrier; or deposited such envelope or package to a regularly maintained drop box or facility to receive documents by the express service carrier with delivery fees provided for.
- ☐ **(BY MESSENGER)** I served the document(s) to the person(s) at the address(es) listed by providing the document(s) to a messenger for personal service. (A proof of service executed by the messenger will be filed in compliance with the *Code of Civil Procedure*).
- ☒ **(BY ELECTRONIC MAIL)** As follows: I caused the above-referenced documents(s) to be transmitted by electronic mail to its intended recipient(s) through ECF at the e-mail addresses indicated above.
- ☐ **(BY PERSONAL SERVICE)** I delivered the foregoing document(s) by hand to the office(s) of the addressee(s).
- ☒ **(FEDERAL)** I declare that I am employed in the office of a member of the bar of this Court at whose direction service was made.

Executed on January 9, 2013, at Los Angeles, CA.


Donna Holland